

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA,)	CRIMINAL NUMBER: 2:15-CR-472
)	
-versus-)	
)	
DYLANN STORM ROOF,)	<u>MOTION FOR ORDER</u>
)	<u>OF PROTECTION</u>
Defendant.)	
_____)	

Andrew John Savage, III, asks the Court to relieve him of court appearances between October 15, 2016, and January 15, 2017. I am a member of the South Carolina Bar and am admitted to practice before the United States District Court for South Carolina. My Federal ID Number is 3734.

In June of 2015, I was engaged as an attorney and counselor at law by the three survivors of the shooting that took place that month at the Emanuel AME Church in Charleston, South Carolina. Additionally, five of the Estates of those who were murdered that evening have engaged me as their attorney and counselor to provide advice and support during the legal proceedings ensuing from the murders in both State and Federal Court.

Those victims are as follows:

Laura W. Moore, Personal Representative of the Estate of Ethel Lance

1. Ester Lance, daughter of Ethel Lance
2. Gary Washington, son of Ethel Lance
3. Sharon Risher, daughter of Ethel Lance
4. Nadine Collier, daughter of Ethel Lance

Walter B. Jackson, Sr., Personal Representative of the Estate of Susie Jackson

Felicia Sanders and Tyrone Sanders, Personal Representatives of the Estate of

Tywanza Sanders

Kevin Singleton, Co-Personal Representative of the Estate of Myra Thompson

Bethane Middleton-Brown, Personal Representative of the Estate of DePayne Middleton-Doctor

Felicia Sanders (survivor)

Polly Sheppard (survivor)

Felicia Sanders and Tyrone Sanders, custodial grandparents of the juvenile survivor (a minor)

Each of the above meets the definition criteria of “crime victim” in accordance with 18 U.S.C. § 3771 and are therefore entitled to the rights enumerated therein.

Each of the above have engaged me to counsel them with respect to the Federal prosecution of Dylann Storm Roof as detailed in the indictment underlying Criminal Case 2:15-CR-472. While it has not yet been necessary in the Federal proceeding, I entered a formal appearance on behalf of the above-listed individuals in the parallel State Court prosecution on July 23, 2015.

Criminal Case number 2:15-CR-472 is pending with this Court with an agreed upon trial date of November 7, 2016.

It appears that the two adult survivors are likely to be called to testify as fact witnesses in the guilt/innocence phase of the federal prosecution of Roof; furthermore, the two survivors, along with the family members of the Estates represented, may be called to testify during the sentencing portion of the trial.

In consideration of the statutory rights of the victims, in accordance with the wishes of the victims, and with the consent of counsel for the United States, I request to be excused and protected

from other court appearances from October 15, 2016, until January 15, 2017, unless the current scheduled trial date in Criminal Case number 2:15CR-472 is changed. I have consulted with both attorneys for the United States and for Dylann Roof. United States Attorney William Nettles consents to this request as noted below. David Bruck, counsel for Roof, takes no position.

Respectfully submitted,

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BY: S/Andrew J. Savage, III
ANDREW J. SAVAGE, III
Federal ID Number: 3734

I CONSENT

S/William F. Nettles
William F. Nettles
United States Attorney for the District of South Carolina

Charleston, South Carolina

June 15, 2016